UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Criminal No. 03-CR-10356-MLW

FRANCIS WHITE

FRANCIS WHITE'S OPPOSITION TO MOTION FOR PRETRIAL DETENTION

****EXCERPT****

Mr. White is also very close to his mother, and has been his entire life. Although Mr. White was offered scholarships to attend college (he was an excellent student, athlete, and president of his high school class), he elected to forego a higher education to stay at home to take care of his mother.

To this day, he remains very involved in his mother's life: he is her legal guardian, and visits her every day. See Exh. G. As one close friend explains, Mr. White

spends time with his mother and watches out for her needs. By living so close to her, he is able to see her often, which is extremely important to an elderly person, and he made sure she had a home health aid and care when she was living at home. He runs errands for her and accompanies her to her doctors' appointments. On holidays, it would be easy for him to go to places he is invited but instead, he chose to stay home so she would have family around and would be comfortable. Although she is in elderly care now,

she was able to live in the home she had known all of her life for many years more than most due to the devoted attention of her son.

Exh. B. Many other letters similarly speak to Mr. White's close, supportive relationship with his mother.